COLORADO DISCHARGE PERMIT SYSTEM (CDPS)
FACT SHEET FOR PERMIT NUMBER CO0027171
MOUNT CRESTED BUTTE WATER & SANITATION DISTRICT, MT. CRESTED BUTTE WWTF
GUNNISON COUNTY

TABLE OF CONTENTS

I. TYPE OF PERMIT

A. Permit Type: Domestic - Major Municipal, Mechanical Plant, Seventh Renewal

B. Discharge To: Surface Water

II. FACILITY INFORMATION

A. SIC Code: 4952 Sewerage Systems

B. Facility Classification: Class B per Section 100.5.2 of the Water and Wastewater Facility Operator Certification Requirements

C. Facility Location: Latitude: 38.883611° N, Longitude: 106.970278° W

D. Permitted Feature: 001A, following disinfection and prior to mixing with the receiving stream. 38.883° N, 106.970° W

The location provided above will serve as the point of compliance for this permit and it is appropriate as it is located after all treatment and prior to discharge to the receiving water.

E. Facility Flows: 1.2 MGD

F. Major Changes From Last Renewal:

- Monitoring of nonylphenol

III. RECEIVING STREAM

A. Waterbody Identification: *COGUUG13, Woods Creek and Washington Gulch*

B. Water Quality Assessment:

An assessment of the stream standards, low flow data, and ambient stream data has been performed to determine the assimilative capacities for *Woods Creek and Washington Gulch* for potential pollutants of concern. This information, which is contained in the Water Quality Assessment (WQA) for this receiving stream(s), also includes an antidegradation review, where appropriate. The Division's Permits Section has reviewed the assimilative capacities to determine the appropriate water quality-based effluent limitations as well as potential limits based on the antidegradation evaluation, where applicable. The limitations based on the assessment and other evaluations conducted as part of this fact sheet can be found in Part I.A of the permit.

Permitted Feature *001A* will be the authorized discharge point to the receiving stream, Woods Creek.

IV. FACILITY DESCRIPTION

A. Infiltration/Inflow (I/I)

Infiltration/Inflow has historically been a contributor to the flows of the Mt. Crested Butte Sanitation District's collection system, during spring snowmelt. The Mt. Crested Butte Sanitation District has an ongoing sewer system maintenance, repair and rehabilitation program. An August 2010 inspection report from the Division noted that Mt. Crested Butte Sanitation District has an on-going infiltration plan and is continuously working on infiltration reduction in priority areas using slip lining, pipe replacement, and manhole repairs. Since the District has an ongoing sewer system maintenance, repair and rehabilitation program and I/I does not currently cause operational problems at the plant, additional conditions to control I/I are not imposed at this time.

B. Lift Stations

Table IV-1 summarizes the information provided in the renewal application for the lift stations in the service area.

Table IV-1 – Lift Station Summary

Station Name/#	Firm Pump Capacity (gpm)	Peak Flows (gpd)	% Capacity (based on peak flow)
Paradise	576000	20000	3.5
Overlook	144000	2000	1.4
MLM	144000	3000	2.1
Pristine Point	144000	800	0.6
Prospect	267840	800	0.3

C. Chemical Usage

The permittee did not specify any chemicals for use in waters that may be discharged. On this basis, no chemicals are approved under this permit. Prior to use of any applicable chemical, the permittee must submit a request for approval that includes the most current Material Safety Data Sheet (MSDS) for that chemical. Until approved, use of any chemical in waters that may be discharged could result in a discharge of pollutants not authorized under the permit. Also see Part II.A.1. of the permit.

Chemicals deemed acceptable for use in waters that will or may be discharged to waters of the State are acceptable only when used in accordance with all state and federal regulations, and in strict accordance with the manufacturer's site-specific instructions.

D. Treatment Facility, Facility Modifications and Capacities

The facility consists of a headworks, two equalization basins, three anoxic/oxic basins, two secondary clarifiers, and a UV disinfection system. The permittee has not performed any construction at this facility that would change the hydraulic capacity of 1.2 MGD or the organic capacity of 3500 lbs BOD_5/day, which were specified in Site Approval 4550. That document should be referred to for any additional information.

Pursuant to Section 100.5.2 of the Water and Wastewater Facility Operator Certification Requirements, this facility will require a Class B certified operator.

E. Biosolids Treatment and Disposal

Sludge generated during the treatment process is dewatered by gravity and hauled to the Town of Crested Butte wastewater treatment plant, where it is further treated and taken to the Gunnison County landfill for disposal.

1. EPA General Permit

   EPA Region 8 issued a General Permit (effective October 19, 2007) for Colorado facilities whose operations generate, treat, and/or use/dispose of sewage sludge by means of land application, landfill, and surface disposal under the National Pollutant Discharge Elimination System. All Colorado facilities are required to apply for and to obtain coverage under the EPA General Permit.

2. Biosolids Regulation (Regulation No. 64, Colorado Water Quality Control Commission)

While the EPA is now the issuing agency for biosolids permits, Colorado facilities that land apply biosolids must comply with requirements of Regulation No. 64, such as the submission of annual reports as discussed later in this rationale.

V. PERFORMANCE HISTORY

A. Monitoring Data

1. Discharge Monitoring Reports – The following tables summarize the effluent data reported on the Discharge Monitoring Reports (DMRs) for the previous permit term, from a period of DMR review from October 2010 through December 2012.

Table V-1 – Summary of DMR Data for Permitted Feature 001A

Parameter	*# Samples or Reporting Periods*	*Reported Average Concentrations Avg/Min/Max*	*Reported Maximum Concentrations Avg/Min/Max*	*AD 2-Year Average Avg/Min/Max*	*Previous Avg/Max/AD Permit Limit*	*Number of Limit Excursions*
Effluent Flow (MGD)	*27*	*0.33/0.12/1.1*	*0.54/0.17/1.8*		*1.2/Report*	
Temp Daily Max (°C)[1]	*4*		*17/16/19*		*NA/Report*	
Temp MWAT (°C)[1]	*4*	*17/16/18*			*NA/Report*	
pH (su)[2]	*27*	*7/6.6/7.6*	*7.8/7.4/8.8*		*6.5 - 9*	
E. coli (#/100 ml)	*25*	*1.2/<1/3*	*2.1/<1/11*	*NA/NA/NA*	*64/128*	
TRC (mg/l)	*5*	*0/0/0*	*0/0/0*	*NA/NA/NA*	*0.005/0.019*	
NH3 as N, Tot (mg/l) Jan[3]	*2*	*0.81/0.12/1.5*	*3/0.28/5.8*	*NA/NA/NA*	***6.1/19*** *2.7/18*	
NH3 as N, Tot (mg/l) Feb[3]	*6*	*0.63/0.1/1.5*	*2.2/0.1/4.3*	*1.1/0.23/1.9*	***7.6/20*** *2.5/18*	
NH3 as N, Tot (mg/l) Mar[3]	*6*	*7.4/0.14/40*	*18/0.5/93*	*0.61/0.45/0.8*	***10/22*** *3.5/18*	
NH3 as N, Tot (mg/l) Apr[3]	*6*	*0.23/0.11/0.66*	*0.47/0.14/1.2*	*0.62/0.35/0.95*	***11/21*** *4.7/18*	
NH3 as N, Tot (mg/l) May[3]	*6*	*0.19/0.01/0.53*	*0.41/0.01/1*	*1.2/0.22/1.9*	***10/21*** *2.4/15*	
NH3 as N, Tot (mg/l) Jun[3]	*6*	*1.9/0.11/7.4*	*5.9/0.13/22*	*1.6/0.8/2.4*	***9.5/22*** *1.9/16*	
NH3 as N, Tot (mg/l) Jul[3]	*6*	*1.2/0.1/5.1*	*3.9/0.1/17*	*1.5/0.77/2.4*	***7.7/21*** *1.9/18*	
NH3 as N, Tot (mg/l) Aug[3]	*6*	*0.86/0.02/2.3*	*2.9/0.03/11*	*1.6/0.75/2.4*	***8/22*** *1.6/15*	
NH3 as N, Tot (mg/l) Sep[3]	*2*	*1.1/0.11/2.2*	*3.7/0.41/7*	*NA/NA/NA*	***7.6/21*** *1.6/17*	
NH3 as N, Tot (mg/l) Oct[3]	*3*	*0.07/0.04/0.13*	*0.12/0.05/0.22*	*0.7/0.7/0.7*	***8.7/21*** *1.8/13*	
NH3 as N, Tot (mg/l) Nov[3]	*3*	*0.49/0.12/0.81*	*2.6/0.57/5.1*	*0.92/0.92/0.92*	***10/21*** *2.0/15*	
NH3 as N, Tot (mg/l) Dec[3]	*3*	*2.1/0.67/4.9*	*6.3/2.5/12*	*NA/NA/NA*	***9/21*** *1.3/15*	
BOD5, effluent (mg/l)	*27*	*3.4/2/7*	*5.9/2/20*		*30/45/*	
BOD5 (% removal)	*25*	*96/85/99*	*NA/NA/NA*		*85*	
TSS, effluent (mg/l)	*27*	*3.8/1/7*	*6.7/3/13*		*30/45/*	
TSS (% removal)	*25*	*97/85/99*	*NA/NA/NA*		*85*	
Oil and Grease (mg/l)	*25*	*NA/NA/NA*	*0/0/0*		*NA/10/*	
TDS (mg/l)						
PWS intake (mg/l)	*25*	*108/39/229*	*119/48/243*	*NA/NA/NA*	*Report/Report/*	

Parameter	***# Samples or Reporting Periods***	***Reported Average Concentrations Avg/Min/Max***	***Reported Maximum Concentrations Avg/Min/Max***	***AD 2-Year Average Avg/Min/Max***	***Previous Avg/Max/AD Permit Limit***	***Number of Limit Excursions***
WWTF effluent (mg/l)	*25*	*285/174/983*	*296/178/996*	*NA/NA/NA*	*Report/Report/*	
As, TR (µg/l)	*10*	*2.5/<0.56/5*	*2.5/<0.56/5*	*NA/NA/NA*	***Report**/ 0.02*	
Cd, Dis (µg/l)[3]	*7*	*0.47/<0.2/1*	*0.47/<0.2/1*	*NA/NA/NA*	***Report/Report** 0.38/1.4*	
Cr, TR (µg/l)	*5*	*5.7/1.8/19*	*5.7/1.8/19*	*NA/NA/NA*	*NA/Report*	
Cr+3, Dis (µg/l)[3]	*7*	*35/0/200*	*35/0/200*	*NA/NA/NA*	***Report/Report** 65/Report*	
Cr+6, Dis (µg/l)[3]	*5*	*44/0/200*	*44/0/200*	*NA/NA/NA*	***Report/Report** 11/16*	
Cu, Dis (µg/l)[3]	*14*	*49/4/136*	*49/4/136*	*NA/NA/NA*	***Report/Report** 7.6/11*	
CN, Free (µg/l)[3]	*5*	*24/0/100*	*24/0/100*	*NA/NA/NA*	***NA/Report** NA/5.1*	
Fe, Dis (µg/l)[4]	*5*	*84/53/100*	*84/53/100*	*NA/NA/NA*	*NA/NA*	
Fe, TR (µg/l)	*10*	*32/6/60*	*NA/NA/NA*	*NA/NA/NA*	*Report/NA*	
Pb, Dis (µg/l)[3]	*11*	*0.27/0.1/0.5*	*0.27/0.1/0.5*	*NA/NA/NA*	***Report/Report** 1.0/Report*	
Mn, Dis (µg/l)[4]	*6*	*19/7.6/56*	*19/7.6/56*	*NA/NA/NA*	*NA/NA*	
Hg, Tot (µg/l)[3]	*6*	*0.33/<0.0002/1.8*	*0.33/<0.0002/1.8*	*NA/NA/NA*	***Report/NA** 0.01/NA*	
Ni, Dis (µg/l)[4]	*6*	*1.8/<2/2.6*	*1.8/<2/2.6*	*NA/NA/NA*	*NA/NA*	
Se, TR (µg/l)[4]	*6*	*2.5/0/5.1*	*2.5/0/5.1*	*NA/NA/NA*	*NA/NA*	
Se, Dis (µg/l)	*1*	*1.6/1.6/1.6*	*1.6/1.6/1.6*	*NA/NA/NA*	*Report/Report*	
Ag, Dis (µg/l)[3]	*7*	*0.52/0/1*	*0.52/0/1*	*NA/NA/NA*	***Report/Report** 0.054/1.4*	
Zn, Dis (µg/l)[3]	*25*	*49/28/120*	*49/28/120*	*NA/NA/NA*	***Report/Report** 53/Report*	
WET, chronic						
pimephales lethality, Stat Diff	*9*	*//*	*100/100/100*	*//*	*StatDiff & IC25≥IWC*	
pimephales lethality, IC25	*9*	*//*	*100/100/100*	*//*		
ceriodaphnia lethality, Stat Diff	*9*	*//*	*100/100/100*	*//*	*StatDiff & IC25≥IWC*	
ceriodaphnia lethality, IC25	*9*	*//*	*100/100/100*	*//*		
pimephales toxicity, Stat Diff	*9*	*//*	*100/100/100*	*//*	*Report*	
pimephales toxicity, IC25	*9*	*//*	*100/100/100*	*//*		
ceriodaphnia toxicity, Stat Diff	*9*	*//*	*100/100/100*	*//*	*Report*	
ceriodaphnia toxicity, IC25	*9*	*//*	*100/100/100*	*//*		

1. *.The temperature data shows the MWAT values in the "average" column, and the daily maximum reported values in the "maximum" column.*
2. *The pH data shows the minimum reported values in the "average" column, and the maximum reported values in the "maximum column.*
3. *Interim limits are in bold text. For total ammonia the actual limits become effective on 07/01/15. For As, Cd, Cr+3, Cr+6, Cu, CN, Pb, Hg, Ag, and Zn the actual limits become effective on 11/01/2014.*
4. *Not required by the permit. Self monitoring conducted by permittee.*

2. Additional Data – The following table summarizes additional monitoring for pretreatment and industrial waste management. Sample results were obtained from December 2007 through December 2009. This information was used for qualitative reasonable potential determination for some metals.

Table V-2 – Summary of Pretreatment data from 12/31/2007 through 12/31/2009

Parameter	*# Samples or Reporting Periods*	*Reported Average Concentrations Avg/Min/Max*	*Reported Maximum Concentrations Avg/Min/Max*
Cr, TR (µg/l)	*5*	*5.7/1.8/19*	*5.7/1.8/19*
Cu, TR (µg/l)	*3*	*7.7/5.6/10*	*7.7/5.6/10*
CN, Tot (µg/l)	*3*	*37/0/100*	*37/0/100*
Pb, TR (µg/l)	*3*	*1.1/0.31/2*	*1.1/0.31/2*
Mo, TR (µg/l)	*3*	*2.3/0.97/4*	*2.3/0.97/4*
Hg, Tot (µg/l) for pretreatment	*2*	*0.01/0/0.02*	*0.01/0/0.02*
Ni, TR (µg/l)	*2*	*2.3/2/2.6*	*2.3/2/2.6*
Phenols- pretreatment	*3*	*73/0/200*	*73/0/200*

B. Compliance With Terms and Conditions of Previous Permit

1. Effluent Limitations – The data shown in the preceding table(s) indicates compliance with the numeric limitations of the previous permit. Although there have been no numeric violations since the previous permit was issued on October 27, 2010, the permittee has had several non-numeric violations such as failure to submit discharge monitoring reports (DMR) and/or late submittals of DMR.

   In accordance with 40 CFR Part 122.41(a), any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

VI. DISCUSSION OF EFFLUENT LIMITATIONS

A. Regulatory Basis for Limitations

1. Technology Based Limitations

   a. Federal Effluent Limitation Guidelines – The Federal Effluent Limitation Guidelines for domestic wastewater treatment facilities are the secondary treatment standards. These standards have been adopted into, and are applied out of, Regulation 62, the Regulations for Effluent Limitations.

   b. Regulation 62: Regulations for Effluent Limitations – These Regulations include effluent limitations that apply to all discharges of wastewater to State waters and are shown in Section VIII of the WQA. These regulations are applicable to the discharge from the Mount Crested Butte Water & Sanitation District WWTF.

2. Numeric Water Quality Standards - The WQA contains the evaluation of pollutants limited by water quality standards. The mass balance equation shown in Section VI of the WQA was used for most pollutants to calculate the potential water quality based effluent limitations (WQBELs), M_2, that could be discharged without causing the water quality standard to be violated. For ammonia, the AMMTOX Model was used to determine the maximum assimilative capacity of the receiving stream. A detailed discussion of the calculations for the maximum allowable concentrations for the relevant parameters of concern is provided in Section VI of the Water Quality Assessment developed for this permitting action.

   The maximum allowable pollutant concentrations determined as part of these calculations represent the calculated effluent limits that would be protective of water quality. These are also known as the water quality-based effluent limits (WQBELs). Both acute and chronic WQBELs may be calculated based on acute and chronic standards, and these may be applied as daily maximum (acute) or 30-day average (chronic) limits.

3. Narrative Water Quality Standards - Section 31.11(1)(a)(iv) of The Basic Standards and Methodologies for Surface Waters (Regulation No. 31) includes the narrative standard that State surface waters shall be free of substances that are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life.

   a. Whole Effluent Toxicity - The Water Quality Control Division has established the use of WET testing as a method for identifying and controlling toxic discharges from wastewater treatment facilities. WET testing is being utilized as a means to ensure that there are no discharges of pollutants "in amounts, concentrations or combinations which are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life" as required by Section 31.11 (1) of the Basic Standards and Methodologies for Surface Waters. The requirements for WET testing are being implemented in accordance with Division policy, Implementation of the Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (Sept 30, 2010). Note that this policy has recently been updated and the permittee should refer to this document for additional information regarding WET.

4. Water Quality Regulations, Policies, and Guidance Documents

   a. Antidegradation - Since the receiving water is Undesignated, an antidegradation review is required pursuant to Section 31.8 of The Basic Standards and Methodologies for Surface Water. As set forth in Section VII of the WQA, an antidegradation evaluation was conducted for pollutants when water quality impacts occurred and when the impacts were significant. Based on the antidegradation requirements and the reasonable potential analysis discussed below, antidegradation-based average concentrations (ADBACs) may be applied.

      According to Division procedures, the facility has three options related to antidegradation-based effluent limits: (1) the facility may accept ADBACs as permit limits (see Section VII of the WQA); (2) the facility may select permit limits based on their non-impact limit (NIL), which would result in the facility not being subject to an antidegradation review and thus the antidegradation-based average concentrations would not apply (the NILs are also contained in Section VII of the WQA); or (3) the facility may complete an alternatives analysis as set forth in Section 31.8(3)(d) of the regulations which would result in alternative antidegradation-based effluent limitations.

The effluent must not cause or contribute to an exceedance of a water quality standard and therefore the WQBEL must be selected if it is lower than the NIL. Where the WQBEL is not the most restrictive, the discharger may choose between the NIL or the ADBAC: the NIL results in no increased water quality impact; the ADBAC results in an "insignificant" increase in water quality impact. The ADBAC limits are imposed as two-year average limits.

b. Antibacksliding – As the receiving water is designated Reviewable and the Division has performed an antidegradation evaluation, in accordance with the Antidegradation Guidance, the antibacksliding requirements in Regulation 61.10 have been met.

c. Determination of Total Maximum Daily Loads (TMDLs) – This stream segment is not on the State's 303(d) list, however, stream segment COGUUG08 to which the Washington Gulch flows into, is currently listed on the State's 303(d) list for development of TMDLs for cadmium and zinc. However, the TMDL has not yet been finalized. Although this permit establishes limits or monitoring requirements for these pollutants, they do not represent the TMDLs and waste load allocations, and are therefore subject to change upon finalization of an approved TMDL for segment COGUUG08. The permit may be reopened to include limitations based upon a finalized TMDL, if necessary.

d. Colorado Mixing Zone Regulations – Pursuant to section 31.10 of The Basic Standards and Methodologies for Surface Water, a mixing zone determination is required for this permitting action. The Colorado Mixing Zone Implementation Guidance, dated April 2002, identifies the process for determining the meaningful limit on the area impacted by a discharge to surface water where standards may be exceeded (i.e., regulatory mixing zone). This guidance document provides for certain exclusions from further analysis under the regulation, based on site-specific conditions.

   The guidance document provides a mandatory, stepwise decision-making process for determining if the permit limits will not be affected by this regulation. Exclusion, based on Extreme Mixing Ratios, may be granted if the ratio of the facility design flow to the chronic low flow (30E3) is greater than 2:1. Since the ratio of the design flow to the chronic low flow is 27:1, the permittee is eligible for exclusion from further analysis under the regulation.

e. Salinity Regulations – In compliance with the Colorado River Salinity Standards and the Colorado Discharge Permit System Regulations, the permittee shall monitor for total dissolved solids on a **Monthly** basis. Samples shall be taken at Permitted Feature 001A.

   An evaluation of the discharge of total dissolved solids indicates that the Mount Crested Butte Water & Sanitation District facility does not exceed the threshold of 1 ton/day or 350 tons/year of salinity. To determine the TDS loading from this facility, the average reported TDS values were multiplied by the average flow, then by 8.34. The average was determined to be 0.43 tons/day.

f. Reasonable Potential Analysis – Using the assimilative capacities contained in the WQA, an analysis must be performed to determine whether to include the calculated assimilative capacities as WQBELs in the permit. This reasonable potential (RP) analysis is based on the Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, dated December, 2002. This guidance document utilizes both quantitative and qualitative approaches to establish RP depending on the amount of available data.

A qualitative determination of RP may be made where ancillary and/or additional treatment technologies are employed to reduce the concentrations of certain pollutants. Because it may be anticipated that the limits for a parameter could not be met without treatment, and the treatment is not coincidental to the movement of water through the facility, limits may be included to assure that treatment is maintained.

A qualitative RP determination may also be made where a federal ELG exists for a parameter, and where the results of a quantitative analysis results in no RP. As the federal ELG is typically less stringent than a limitation based on the WQBELs, if the discharge was to contain concentrations at the ELG (above the WQBEL), the discharge may cause or contribute to an exceedance of a water quality standard.

To conduct a quantitative RP analysis, a minimum of 10 effluent data points from the previous 5 years, should be used. The equations set out in the guidance for normal and lognormal distribution, where applicable, are used to calculate the maximum estimated pollutant concentration (MEPC). For data sets with non-detect values, and where at least 30% of the data set was greater than the detection level, MDLWIN software is used consistent with Division guidance to generate the mean and standard deviation, which are then used to establish the multipliers used to calculate the MEPC. If the MDLWIN program cannot be used the Division's guidance prescribes the use of best professional judgment.

For some parameters, recent effluent data or an appropriate number of data points may not be available, or collected data may be in the wrong form (dissolved vs. total) and therefore may not be available for use in conducting an RP analysis. Thus, consistent with Division procedures, monitoring will be required to collect samples to support a RP analysis and subsequent decisions for a numeric limit. A compliance schedule may be added to the permit to require the request of an RP analysis once the appropriate data have been collected.

For other parameters, effluent data may be available to conduct a quantitative analysis, and therefore an RP analysis will be conducted to determine if there is RP for the effluent discharge to cause or contribute to exceedances of ambient water quality standards. The guidance specifies that if the MEPC exceeds the maximum allowable pollutant concentration (MAPC), limits must be established and where the MEPC is greater than half the MAPC (but less than the MAPC), monitoring must be established. Table VI-1 contains the calculated MEPC compared to the corresponding MAPC, and the results of the reasonable potential evaluation, for those parameters that met the data requirements. The RP determination is discussed for each parameter in the text below.

Table VI-1 – Reasonable Potential Analysis

Parameter	30-Day Average			7-Day Ave or Daily Max			Antideg (2 Year Roll. Ave)		
	MEPC	MAPC	Reasonable Potential	MEPC	MAPC	Reasonable Potential	MEPC	MAPC	Reasonable Potential
Temp Daily Max (°C) June-Sept				19	22	Monitor			
Temp Daily Max (°C) Oct-May				17	13	Monitor			
Temp MWAT (°C) June-Sept	18	17	Monitor						

Temp MWAT (°C) Oct-May	17	9	Monitor						
E. coli (#/100 ml)	NA	44	Yes (Qual)	NA	260	Yes (Qual)	NA	NA	NA
TRC (mg/l)	0	0.005	Yes (Qual)	0	0.02	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Jan	9.1	2.7	Yes (Qual)	15	15	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Feb	1.5	2.5	Yes (Qual)	4.3	17	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Mar	40	3.5	Yes (Qual)	93	17	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Apr	0.66	4.7	Yes (Qual)	1.2	17	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) May	0.53	2.4	Yes (Qual)	1	13	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Jun	7.4	1.9	Yes (Qual)	22	15	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Jul	5.1	1.9	Yes (Qual)	17	17	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Aug	2.3	1.6	Yes (Qual)	11	15	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Sep	2.2	1.6	Yes (Qual)	7	15	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Oct	0.9	1.8	Yes (Qual)	1.6	13	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Nov	0.9	2	Yes (Qual)	5.1	13	Yes (Qual)	NA	NA	NA
NH3 as N, Tot (mg/l) Dec	14	1.3	Yes (Qual)	25	15	Yes (Qual)	NA	NA	NA
As, TR (µg/l)	22	0.021	Yes	NA	NA	NA	NA	NA	NA
As, Dis (µg/l)	NA	353	No (Qual)	NA	353	No (Qual)	NA	55	No (Qual)
Cd, Dis (µg/l)	1.0	0.32	Yes (Qual)	1	2.2	Yes (Qual)	NA	NA	NA
Cr+3, TR (µg/l)	NA	NA	NA	NA	52	No (Qual)	NA	NA	NA
Cr+3, Dis (µg/l)	19	91	No (Qual)	NA	NA	NA	NA	NA	NA
Cr+6, Dis (µg/l)	20	11	Yes (Qual)	20	17	Yes (Qual)	NA	NA	NA
Cu, Dis (µg/l)	522	11	Yes	522	16	Yes	NA	NA	NA
CN, Free (µg/l)				100	5.2	Yes (Qual)	NA	NA	NA
Fe, TR (µg/l)	176	1025	No				47	234	No
Pb, Dis (µg/l)	3	1.0	Yes	3	85	No	0.81	NA	NA
Mn, Dis (µg/l)	56	1835	No (Qual)	56	3323	No (Qual)	32	287	No (Qual)
Mo, TR (µg/l)	4	166	No (Qual)	NA	NA	NA	NA	25	No (Qual)
Hg, Tot (µg/l)	1.8	0.01	Yes (Qual)	NA	NA	NA	NA	NA	NA
Ni, Dis (µg/l)	2.6	64	No (Qual)	2.6	583	No (Qual)	2.6	9.6	No (Qual)
Se, Dis (µg/l)	1.6	4.7	No (Qual)	1.6	19	No (Qual)	1.6	2	Monitor
Ag, Dis (µg/l)	1.0	0.11	Yes (Qual)	1	3	Yes (Qual)	NA	NA	NA
Zn, Dis (µg/l)	131	88	Yes	131	202	Monitor	57	63	Monitor
Nonylphenol (µg/l)	NA	6.8	Monitor	NA	29	Monitor	NA	1	Monitor

B. Parameter Evaluation

BOD_5 - The BOD_5 concentrations in Reg 62 are the most stringent effluent limits and are therefore applied. The removal percentages for BOD_5 also apply based on the Regulations for Effluent Limitations.

These limitations are the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Total Suspended Solids - The TSS concentrations in Reg 62 are the most stringent effluent limits and are therefore applied. The removal percentages for TSS also apply based on the Regulations for Effluent Limitations.

These limitations are the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Oil and Grease – The oil and grease limitations from the Regulations for Effluent Limitations are applied as they are the most stringent limitations.

This limitation is the same as that contained in the previous permit and is imposed upon the effective date of this permit.

pH - This parameter is limited by the water quality standards of 6.5-9.0 s.u., as this range is more stringent than other applicable standards.

This limitation is the same as that contained in the previous permit and is imposed upon the effective date of this permit.

E. Coli – The limitation for *E. Coli* is based upon the NIL as described in the WQA. A qualitative determination of RP has been made as the treatment facility has been designed to treat specifically for this parameter. A 30-day limitation of 44 #/100ml and 7-day limitation of 260 #/100 ml (twice the chronic WQBEL of 130 #/100ml) have been included in the permit.

Previous monitoring as shown in Table V-1 indicate that this limitation can be met and is therefore imposed upon the effective date of the permit.

Total Residual Chlorine (TRC) - The limitation for TRC is based upon the NIL as described in the WQA. A qualitative determination of RP has been made as chlorine may be used in the treatment process.

Previous monitoring as shown in Table V-1 indicate that this limitation can be met and is therefore imposed upon the effective date of the permit.

Ammonia - The limitation for ammonia is based upon the NIL as described in the WQA. A qualitative determination of RP has been made as ammonia is a parameter of concern for municipal wastewater treatment facilities.

Based upon previous monitoring, the permittee may not be able to consistently meet these limitations; therefore a compliance schedule has been added to the permit to allow the permittee time to meet more stringent ammonia limitations, with the 2004 permit limitations as interim limits. Therefore, the 2004 limitations will continue as interim limits in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Total Arsenic – The RP analysis for total arsenic was based upon the WQBEL as described in the WQA. With the available data the normal program was used to determine the appropriate statistics to determine

the MEPC. The MEPC was greater than the MAPC and therefore limitations are required. A 0.021 µg/l (30-day average) requirement has been added to the permit.

Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit to allow the permittee time to meet a more stringent limitation, with the 2004 permit limitation as interim limit. The 2004 limitation will continue as interim limit in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Potentially Dissolved Arsenic – A qualitative "no RP" determination was made based on the data for total arsenic. The MAPC is significantly higher that the MEPC. No limitation will be required at this time.

Potentially Dissolved Cadmium – A qualitative RP analysis was conducted as there was not enough data to conduct a quantitative RP analysis. Sample results for potentially dissolved cadmium were as high as 1.0 µg/l, compared to the WQBEL of 0.32 µg/l. Therefore, a qualitative determination of RP has been made and limitations will be added to the permit. Limitations of 0.32 µg/l (30-day average) and 2.2 µg/l (daily max) have been added to the permit. Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit to allow the permittee time to meet more stringent limitations, with the 2004 permit limitations as interim limits. These limitations will continue as interim limits in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Potentially Dissolved Trivalent Chromium and Total Recoverable Trivalent Chromium – A qualitative "no RP" determination was made based on the data for total chromium. The MAPCs for Cr+3 (TR and Dis) were higher that the MEPCs. No limitation will be required at this time.

Dissolved Hexavalent Chromium – A qualitative "yes RP" has been made based on result of sample collected 06/30/10. Sample result was 20 µg/l, compared to the WQBEL of 11 µg/l. Limitations of 11 µg/l (30-day average) and 17 µg/l (daily max) have been added to the permit. Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit to allow the permittee time to meet more stringent limitations, with the 2004 permit limitations as interim limits. These limitations will continue as interim limits in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Potentially Dissolved Copper – The RP analysis for potentially dissolved copper was based upon the WQBEL described in the WQA. With the available data the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was greater than the MAPC and therefore limitations are required. Limitations of 11 µg/l (30-day average) and 16 µg/l (daily max) have been added to the permit. Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit to allow the permittee time to meet more stringent limitations, with the 2004 permit limitations as interim limits. These limitations will continue as interim limits in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Free Cyanide - A qualitative RP analysis was conducted as there was not enough data to conduct a quantitative RP analysis. Sample results for cyanide were as high as 100 µg/l compared to the WQBEL of 5.2 µg/l. Therefore, a qualitative determination of RP has been made and limitations will be added to the permit. Limitation of 5.2 µg/l (daily max) has been added to the permit. Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit to allow the permittee time to meet more stringent limitations, with the 2004 permit limitations as interim limits. These limitations will continue as interim limits in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Total Recoverable Iron - The RP analysis for total recoverable iron was based upon the ADBAC as calculated in the WQA. With the available data the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than half of the MAPC; therefore limitations are not necessary at this time.

Potentially Dissolved Lead - The RP analysis for potentially dissolved lead was based upon the NIL as described in the WQA. With the available data the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was greater than the MAPC; therefore limitations are required. A quantitative "no RP" was made based on the acute WQBEL as the MEPC was less than half of the MAPC. Therefore reporting only will be required for daily maximum. A limitation of 1.0 µg/l (30-day average) has been added to the permit. Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit to allow the permittee time to meet a more stringent limitation, with the 2004 permit limitations as interim limits. This limitation will continue as interim limits in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Potentially Dissolved Manganese and Potentially Dissolved Nickel - A qualitative RP analysis was conducted as there was not enough data to conduct a quantitative RP analysis. A determination of "no RP" was made as the MEPCs were significantly higher than the MAPCs. Limitations are not necessary at this time.

Total Mercury - A qualitative RP analysis was conducted as there was not enough data to conduct a quantitative RP analysis. Sample results for mercury were as high as 0.2 µg/l, compared to the WQBEL of 0.01 µg/l. Therefore, a qualitative determination of RP has been made and limitations will be added to the permit. Limitation of 0.01 µg/l (30-day ave) has been added to the permit. Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit with the 2004 permit limitation as interim limit. This limitation will continue as interim limit in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Total Recoverable Molybdenum - There were no effluent samples to determine a quantitative RP, however, a qualitative no RP was made based upon the pretreatment data in Table V-2. Limitations are not necessary at this time.

Potentially Dissolved Selenium - A qualitative RP analysis was conducted as there was not enough data to conduct a quantitative RP analysis. The single sample result of 09/30/2012 was 1.6 µg/l. The result was less than the ADBAC but greater than 50% of the ADBAC; therefore monitoring will be required.

Potentially Dissolved Silver - A qualitative RP analysis was conducted as there was not enough data to conduct a quantitative RP analysis. Sample results for potentially dissolved silver were as high as 1.0 µg/l, compared to the chronic WQBEL of 0.11 µg/l. Therefore, a qualitative determination of RP has been made and limitations will be added to the permit. Limitations of 0.11 µg/l (30-day average) and 3.0 µg/l (daily max) have been added to the permit.

Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit to allow the permittee time to meet more stringent limitations, with the 2004 permit limitations as interim limits. These limitations will continue as interim limits in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Potentially Dissolved Zinc - The RP analysis for zinc was based upon the chronic WQBEL as described in the WQA. With the available data log-normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was greater than the MAPC; therefore limitations are required. For the ADBAC and acute WQBEL, the MEPC was less than the MAPC and therefore limitations are not necessary at this time, however the MEPC was greater than 50% of the MAPC and therefore monitoring is required. A "report only" requirement has been imposed upon the effective date of the permit. A 30-day ave limitation of 88 µg/l has been included in the permit.

Based upon previous monitoring, the permittee may not be able to consistently meet this limitation; therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation. A compliance schedule was provided in the previous permit to allow the permittee time to meet more stringent limitations, with the 2004 permit limitations as interim limits. These limitations will continue as interim limits in this permit. Additional information is provided in Section VII.D of this fact sheet and the compliance schedule section of the permit.

Temperature – With the available data for October through May, the lognormal program would provide a Yes RP determination, however, there are no sufficient data for RP determination for the rest of the year. The Division allows 5 years of temperature monitoring for similar facilities, therefore, report only conditions will be required for the duration of this permit. Upon the next permit renewal, the collected temperature data will be used to determine if there is reasonable potential, and/or if the permittee can meet the limitation.

As continuous ambient water quality data, in accordance with the definition of the standard, is not available for all months, the permittee is encouraged to collect instream data on a continuous basis. This data may be used during the next permit renewal, so that the assimilative capacity of the receiving water (if applicable) can be calculated and used to determine a limitation based on the streams dilution potential. If such data is not available, the Division will likely set the limitation at the water quality standard (i.e. end of pipe limit, no dilution).

The MWAT is the maximum weekly average temperature, as determined by a seven day rolling average, using at least 3 equally spaced temperature readings in a 24-hour day (at least every 8 hours for a total of at least 21 data points).

The daily maximum is defined as the maximum 2 hour average, with a minimum of 12 equally spaced measurements throughout the day.

Organics – The organic chemical, nonylphenol, is reasonably expected to be present in the effluent from municipal wastewater treatment facilities. A qualitative determination of RP has been made as this facility is a major municipal wastewater treatment facility. Monitoring of nonylphenol has been included in the permit, beginning one year from the effective date of this permit. The delayed effective date allows time for the permittee to develop a site-specific PQL, if deemed necessary.

Whole Effluent Toxicity (WET) Testing – For this facility, chronic WET testing has been determined to be applicable based on the instream waste concentrations calculated in the WQA. A qualitative RP has been made as this is a major POTW with potential for a wide variety of pollutants including metals.

The permittee should read the WET testing section of Part I of the permit carefully, as this information has been updated in accordance with the Division's updated policy, Implementation of the Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (Sept 30, 2010) . The permit outlines the test requirements and the required follow-up actions the permittee must take to resolve a toxicity incident. The permittee should also read the above mentioned policy which is available on the Permit Section website. The permittee should be aware that some of the conditions outlined above may be subject to change if the facility experiences a change in discharge, as outlined in Part II.A.2. of the permit. Such changes shall be reported to the Division immediately.

C. Parameter Speciation

Total / Total Recoverable Metals (EXCEPT Arsenic)
For standards based upon the total and total recoverable methods of analysis, the limitations are based upon the same method as the standard.

Total / Total Recoverable Arsenic
For total recoverable arsenic, the analysis may be performed using a graphite furnace, however, this method may produce erroneous results and may not be available to the permittee. Therefore, the total method of analysis will be specified instead of the total recoverable method.

Total Mercury
Until recently there has not been an effective method for monitoring low-level total mercury concentrations in either the receiving stream or the facility effluent.

To ensure that adequate data are gathered to show compliance with the limitation and consistent with Division initiatives for mercury, quarterly effluent monitoring for total mercury at low-level detection methods will be required by the permit.

Dissolved Metals / Potentially Dissolved
For metals with aquatic life-based dissolved standards, effluent limits and monitoring requirements are typically based upon the potentially dissolved method of analysis, as required under Regulation 31, Basic Standards and Methodologies for Surface Water. Thus, effluent limits and/or monitoring requirements for these metals will be prescribed as the "potentially dissolved" form.

Cyanide

For cyanide, the acute standard is in the form of "free" cyanide concentrations. However, there is no analytical procedure for measuring the concentration of free cyanide in a complex effluent. Therefore, ASTM (American Society for Testing and Materials) analytical procedure D2036-81, Method C, will be used to measure weak acid dissociable cyanide in the effluent. This analytical procedure will detect free cyanide plus those forms of complex cyanide that are most readily converted to free cyanide.

Hexavalent Chromium
For hexavalent chromium, samples must be unacidified. Accordingly, dissolved concentrations will be measured rather than potentially dissolved concentrations.

VII. ADDITIONAL TERMS AND CONDITIONS

A. Monitoring

Effluent Monitoring – Effluent monitoring will be required as shown in the permit document. Refer to the permit for locations of monitoring points. Monitoring requirements have been established in accordance with the frequencies and sample types set forth in the Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Industrial and Domestic Wastewater Treatment Facilities. This policy includes the methods for reduced monitoring frequencies based upon facility compliance as well as for considerations given in exchange for instream monitoring programs initiated by the permittee. Table VI-2 shows the results of the reduced monitoring frequency analysis for Permitted Feature 001A based upon compliance with the previous permit.

The quarterly monitoring frequency for mercury is imposed consistent with the Divisions' recent initiative to include quarterly monitoring for mercury because of the changes in analytical procedure that will allow total mercury to be quantified at much lower concentrations.

Table VII-1 – Monitoring Reduction Evaluation

Parameter	*Proposed Permit Limit*	*Average of 30-Day (or Daily Max) Average Conc.*	*Standard Deviation*	*Long Term Characterization (LTC)*	*Reduction Potential*
Temp MWAT (°C) Oct-May	*9*	*12*	*2.1*	*16.2*	*None*
pH (su) Minimum	*min 6.5*	*7*	*0.3*	*6.4*	*None*
pH (su) Maximum	*max 9.0*	*7.7*	*0.3*	*8.3*	
E. coli (#/100 ml)	*44*	*1.2*	*0.51*	*2.22*	*3 Levels*
TRC (mg/l)	*0.005*	*0*	*0*	*0*	*3 Levels*
NH3 as N, Tot (mg/l)	*1.3*	*0.78*	*1.1*	*2.98*	*None*
BOD5, effluent (mg/l)	*30*	*3.4*	*1.4*	*6.2*	*3 Levels*
TSS, effluent (mg/l)	*30*	*4*	*1.3*	*6.6*	*3 Levels*
Oil and Grease (mg/l)	*10*	*0*	*0*	*0*	*3 Levels*
As, TR (µg/l)	*0.021*	*2.5*	*2.2*	*6.9*	*None*
Cd, Dis (µg/l)	*0.52*	*0.47*	*0.5*	*1.47*	*None*
Cr+6, Dis (µg/l)	*11*	*44*	*88*	*220*	*None*
Cu, Dis (µg/l)	*11*	*37*	*42*	*121*	*None*
CN, Free (µg/l)	*5.2*	*24*	*43*	*110*	*None*
Pb, Dis (µg/l)	*1.0*	*0.41*	*0.31*	*1.03*	*None*
Mo, TR (µg/l)	*0.01*	*0.33*	*0.72*	*1.77*	*None*
Hg, Tot (µg/l)	*0.01*	*0.33*	*0.72*	*1.77*	*None*
Se, Dis (µg/l)	*4.7*	*1.6*	*NA*	*NA*	*None*
Ag, Dis (µg/l)	*0.11*	*0.52*	*0.5*	*1.52*	*None*
Zn, Dis (µg/l)	*88*	*49*	*21*	*91*	*None*

B. Reporting

1. Discharge Monitoring Report – The Mount Crested Butte Water & Sanitation District facility must submit Discharge Monitoring Reports (DMRs) on a monthly basis to the Division. These reports should contain the required summarization of the test results for all parameters and monitoring frequencies shown in Part I.A.2 of the permit. See the permit, Part I.D for details on such submission.

2. Special Reports – Special reports are required in the event of an upset, bypass, or other noncompliance. Please refer to Part II.A. of the permit for reporting requirements. As above, submittal of these reports to the US Environmental Protection Agency Region VIII is no longer required.

C. Signatory and Certification Requirements

Signatory and certification requirements for reports and submittals are discussed in Part I.D.8. of the permit.

D. Compliance Schedules

The following compliance schedules are included in the permit. See Part I.B of the permit for more information.

Ammonia - A compliance schedule for ammonia was included in the previous permit with a deadline for compliance with the new limitations of July 1, 2015. Since ammonia limitations are further reduced in this permit, an extension of the compliance schedule for ammonia is warranted. Therefore, the permittee has been given four years from the effective date of the permit, July 1, 2017, to comply with the required limitations for ammonia. This compliance schedule will give the permittee reasonable time to further evaluate the facility upgrades necessary to achieve the required permit limits.

Total Arsenic, Potentially Dissolved Cadmium, Dissolved Hexavalent Chromium, Potentially Dissolved Copper, Free Cyanide, Potentially Dissolved Lead, Total Mercury, Potentially Dissolved Silver and Potentially Dissolved Zinc - A compliance schedule for these parameters were included in the previous permit with a deadline for compliance with the new limitations of November 1, 2014. Even though the permit limitations are further reduced for only a few parameters, an extension of the compliance schedule for all of these parameters is warranted as the treatment upgrades necessary to address these constituents would be similar. The permittee has been given four years from the effective date of the permit, July 1 2017, to comply with the required limitations for total arsenic, potentially dissolved cadmium, dissolved hexavalent chromium, potentially dissolved copper, free cyanide, potentially dissolved lead, total mercury, potentially dissolved silver and potentially dissolved zinc. The compliance schedule will give the permittee reasonable time to evaluate the facility upgrades necessary to achieve the required permit limits.

All information and written reports required by the following compliance schedules should be directed to the Permits Section for final review unless otherwise stated.

E. Stormwater

Pursuant to 5 CCR 1002-61.3(2), wastewater treatment facilities with a design flow of 1.0 mgd or more, or that are required to have an approved pretreatment program, are specifically required to obtain stormwater discharge permit coverage or a Stormwater No Exposure Certification, in order to discharge stormwater from their facilities to state waters. The stormwater discharge permit applicable to wastewater treatment facilities is the CDPS General Permit for Stormwater Discharges Associated with Non-Extractive Industrial Activity.

Division records indicate that Mount Crested Butte Water & Sanitation District applied for and obtained coverage under this permit for the Mt. Crested Butte SD. The CDPS certification number is COR011213.

F. Economic Reasonableness Evaluation

Section 25-8-503(8) of the revised (June 1985) Colorado Water Quality Control Act required the Division to "determine whether or not any or all of the water quality standard based effluent limitations are reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons, and are in furtherance of the policies set forth in sections 25-8-192 and 25-8-104."

The Colorado Discharge Permit System Regulations, Regulation No. 61, further define this requirement under 61.11 and state: "Where economic, environmental, public health and energy impacts to the public and affected persons have been considered in the classifications and standards setting process, permits written to meet the standards may be presumed to have taken into consideration economic factors unless:

a. A new permit is issued where the discharge was not in existence at the time of the classification and standards rulemaking, or

b. In the case of a continuing discharge, additional information or factors have emerged that were not anticipated or considered at the time of the classification and standards rulemaking."

The evaluation for this permit shows that the Water Quality Control Commission, during their proceedings to adopt the Classifications and Numeric Standards for Gunnison and Lower Dolores River Basins, considered economic reasonableness.

Furthermore, this is not a new discharger and no new information has been presented regarding the classifications and standards. Therefore, the water quality standard-based effluent limitations of this permit are determined to be reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons and are in furtherance of the policies set forth in Sections 25-8-102 and 104. If the permittee disagrees with this finding, pursuant to 61.11(b)(ii) of the Colorado Discharge Permit System Regulations, the permittee should submit all pertinent information to the Division during the public notice period.

VIII. REFERENCES

A. Colorado Department of Public Health and Environment, Water Quality Control Division Files, for Permit Number CO0027171.

B. "Design Criteria Considered in the Review of Wastewater Treatment Facilities", Policy 96-1, Colorado Department of Public Health and Environment, Water Quality Control Commission, April 2007.

C. Basic Standards and Methodologies for Surface Water, Regulation No. 31, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 31, 2013.

D. Classifications and Numeric Standards for Gunnison and Lower Dolores River Basins, Regulation No. 35, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2013.

E. Colorado Discharge Permit System Regulations, Regulation No. 61, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 1, 2012.

F. Regulations for Effluent Limitations, Regulation No. 62, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective July 30, 2012.

G. Pretreatment Regulations, Regulation No. 63, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 01, 2007.

H. Biosolids Regulation, Regulation No. 64, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2010.

I. Colorado River Salinity Standards, Regulation No. 39, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective August 30, 1997.

J. Colorado's Section 303(d) List of Impaired Waters and Monitoring and Evaluation List, Regulation No 93, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 30, 2010.

K. Antidegradation Significance Determination for New or Increased Water Quality Impacts, Procedural Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December 2001.

L. Memorandum Re: First Update to (Antidegradation) Guidance Version 1.0, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 23, 2002.

M. Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December2002.

N. The Colorado Mixing Zone Implementation Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 2002.

O. Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Domestic and Industrial Wastewater Treatment Facilities, Water Quality Control Division Policy WQP-20, May 1, 2007.

P. Implementing Narrative Standards in Discharge Permits for the Protection of Irrigated Crops, Water Quality Control Division Policy WQP-24, March 10, 2008.

Q. Implementing Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (WET) Testing. Colorado Department of Public Health and Environment, Water Quality Control Division Policy Permits-1, September 30, 2010.

R. Policy for Conducting Assessments for Implementation of Temperature Standards in Discharge Permits, Colorado Department of Public Health and Environment, Water Quality Control Division, Policy Number WQP-23, effective July 3, 2008.

S. Policy for Permit Compliance Schedules, Colorado Department Public Health and Environment, Water Quality Control Division Policy Number WQP-30, effective December 2, 2010.

T. Procedural Regulations for Site Applications for Domestic Wastewater Treatment Works, Regulation No. 22, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2009.

U. Regulation Controlling discharges to Storm Sewers, Regulation No. 65, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective May 30, 2008.

V. Water and Wastewater Facility Operator Certification Requirements, Regulation No. 100, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2007.

Abigail Ogbe
05/22/13

IX. PUBLIC NOTICE COMMENTS

The public notice period was from April 19, 2013 to May 20, 2013. Comments were received from the Mt. Crested Butte Water & Sanitation District. Topical summaries of the comments and the response of the Division are given below.

COMMENT 1: We wish to be exempted from a mixing zone study due to the fact that our discharge is so high a percentage of our receiving waters.

RESPONSE 1: This permit does not require a mixing zone study. The factsheet states that "Since the ratio of the design flow to the chronic low flow is 27:1, the permittee is eligible for exclusion from further analysis under the regulation." See Section VI.A.4.d of the factsheet for details on mixing zones.

COMMENT 2: We do not have anything to do with Mountain View Villages, please remove Mountain View Villages from the web posting.

RESPONSE 2: This web posting error was corrected during the public notice. Reference to Mountain View Villages, posted with Mt. Crested Butte was removed during the public notice period.

Abigail Ogbe
05/22/13